



Hannah Dwyer
hdwyer@cravath.com
T+1-212-474-1242
New York

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Doyle v. Gentile, 1:21-cv-08528 (S.D.N.Y.)

Dear Judge Wang:

We write in regards to the Court's order dated December 20, 2024. (ECF No. 135.) In the Court's order, the Court instructed the parties: "Under no circumstances are the parties to contact the proposed third-party witnesses unless permitted to do so by the Court." (*Id.*) Mr. Doyle respectfully requests that the Court modify its order to clarify that the parties are not permitted to contact the proposed third party witnesses "for the purposes of conducting third party discovery" in the above-captioned matter.

Counterclaim Defendants' proposed third party witnesses include three individuals who are integral to Mr. Doyle's personal and professional life: (1) Eva Pae; (2) Sigrid Gilmer; and (3) Catherine¹ Masud. Ms. Pae is Mr. Doyle's romantic partner, with whom he lives in Estonia. Ms. Gilmer is currently working with Mr. Doyle on a project unrelated to this case or the works at issue, and Ms. Masud serves as Mr. Doyle's translator and advisor on an unrelated project in Bangladesh. Mr. Doyle needs to be able to communicate with all three of these individuals regularly in light of his personal relationship with Ms. Pae, and his professional obligations to Ms. Gilmer and Ms. Masud.

Accordingly, Mr. Doyle respectfully requests that the Court modify its order to allow him to communicate with these women. Mr. Doyle will refrain from contacting any of the other third parties discussed at the status conference.

Respectfully,

/s/ *Hannah Dwyer*

Hannah Dwyer

¹ Counterclaim Defendants referred to Ms. Masud as "Claudia Massaud" at the hearing.